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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	Chapter 11
	§	Case No. 21-30085-hdh-11
NATIONAL RIFLE ASSOCIATION	§	Jointly Administered
OF AMERICA and SEA GIRT LLC	§	
	§	Hearing Date: 4/5/2021
DEBTORS.	§	Hearing Time: 10:30 a.m.

**ACKERMAN MCQUEEN, INC.'S THIRD AMENDED WITNESS AND EXHIBIT LIST
FOR HEARING ON ACKERMAN MCQUEEN, INC.'S MOTION TO DISMISS THE
CHAPTER 11 BANKRUPTCY PETITION, OR, IN THE ALTERNATIVE, MOTION
FOR THE APPOINTMENT OF A CHAPTER 11 TRUSTEE**

TO THE HONORABLE HARLIN D. HALE,
UNITED STATES BANKRUPTCY JUDGE:

Ackerman McQueen, Inc. (“*AMc*”) designates the following amended witnesses and exhibits for the hearing on its Motion to Dismiss the Chapter 11 Bankruptcy Petition, or, in the Alternative, Motion for the Appointment of a Chapter 11 Trustee (the “*Hearing*”) that commenced on **April 5, 2021 at 10:30 a.m.:**

DESIGNATION OF WITNESSES

PLEASE BE ADVISED that AMc may, only to the extent necessary and in its sole discretion, offer the testimony of the following persons as witnesses at the Hearing. AMc further reserves the right to call any additional persons as witnesses at the Hearing, which may be designated or called by any other party. AMc, in its sole discretion, additionally reserves the right to call any and all additional witnesses as may be necessary for rebuttal and/or impeachment.

1. Wayne LaPierre;
2. Corporate Representative(s) of the National Rifle Association of America;
3. Charles Cotton;
4. Carolyn Meadows;
5. Sonya Rowling;
6. John Frazer;
7. Craig Spray;
8. David Warren;
9. Millie Hallow (by deposition);
10. William Winkler;
11. Melanie Montgomery;
12. Nader Tavangar;
13. Revan McQueen;
14. Anthony Makris;
15. Christopher Cox;
16. Oliver North (by deposition);
17. Steve Hart (by deposition);
18. Hon. Phillip Journey;
19. Daniel Boren (by deposition);

20. Any witness necessary to authenticate the exhibits designated herein;
21. Any witness necessary to rebut and/or impeach the testimony of a witness called or designated by any other party; and
22. Any witness designated on another party's witness list.

DESIGNATION OF EXHIBITS

PLEASE BE ADVISED that AMc may, at its sole election, request that the Court take judicial notice of or otherwise offer any of the below listed documents into evidence at the time of the Hearing. AMc further reserves the right to offer any documents, which may be designated or offered by any other party. AMc, in its sole discretion, additionally reserves the right to offer any exhibits (whether designated below) as may be necessary for impeachment or rebuttal. AMc further reserves the right to supplement or amend this exhibit list at any time.

Exhibit	Date	Exhibit Identification	Entered Deposition Exhibit	Offer	Admit
1.	01/15/21	NRA Voluntary Petition for Bankruptcy (Ch. 11)	AMc EX 1		
2.	11/24/20	Texas Certificate of Formation for Sea Girt (Nov. 2020)			
3.	n/a	Sea Girt BancorpSouth Bank Transactions			
4.	01/31/21	Sea Girt BankcorpSouth January 2021 Bank Statement			
5.	02/22/21	Sea Girt Bank Account Closure Confirmation			
6.	01/13/21	Transfer of Funds from NRA to Sea Girt	AMc EX 6		
7.	09/10/20	Special Litigation Committee Email from Frazer			
8.	09/10/20	Resolution Formalizing Special Litigation Committee	AMc EX 8		
9.	01/07/21	Minutes of the Meeting of the Board of Directors of the NRA			

10.	10/24/20	NRA Bylaws	AMc EX 11		
11.	01/01/21	Wayne LaPierre Employment Agreement (Executed)	AMc EX 12		
12.	01/20/21	First Day Motions Hearing Transcript	AMc EX 13		
13.	02/15/21	Sea Girt Schedules A, B, D-H, with Summary of Assets	AMc EX 16		
14.	02/15/21	Sea Girt Statement of Financial Affairs	AMc EX 17		
15.	02/15/21	NRA Schedules A, B, D-H, with Summary of Assets	AMc EX 18		
16.	02/15/21	NRA Statement of Financial Affairs			
17.	02/18/21	NRA Schedules			
18.	03/04/21	NRA Amended Schedules A, B and D-H with Summary of Assets	AMc EX 22		
19.	03/04/21	Sea Girt Amended Schedules E-F with Summary of Assets			
20.	03/04/21	NRA Amended Statement of Financial Affairs	AMc EX 24		
21.	03/22/19	North correspondence to Brewer			
22.	03/31/19	North correspondence to LaPierre	AMc EX 26		
23.	04/08/19	North correspondence to LaPierre			
24.	03/30/20	Affidavit of Revan McQueen			
25.	06/03/20	Affidavit of Revan McQueen			

26.	06/03/20	Declaration of Dan Boren			
27.	06/03/20	Declaration of Edmund Martin			
28.	06/03/20	Declaration of Melanie Montgomery			
29.	06/03/20	Declaration of Nader Tavangar			
30.	06/03/20	Declaration of Tony Makris			
31.	06/03/20	Declaration of William Winkler			
32.	01/26/16	American Express Corporate Card Statement			
33.	07/15/19	Cummins Memorandum	AMc EX 59		
34.	7/13/18	List of Top Concerns for Audit Committee			
35.	03/22/19	North correspondence to NRA Audit Committee			
36.	04/22/19	LaPierre letter to Mark Dycio	AMc EX 70		
37.	06/05/19	NRA Policy Manual	AMc EX 71		
38.	04/18/19	North and Richard Childress (NRA 1st VP) correspondence to John Frazer and Charles Cotton			
39.	04/25/19	Oliver North email to Frazer			
40.	01/15/21	NRA Forward - Leadership Quotes — NRA Dumps New York to Reincorporate in Texas	AMc EX 76		
41.	07/13/18	Rowling Email and Top Audit Concerns	AMc EX 84		

42.	01/12/21	Sea Girt Operating Agreement			
43.	12/04/18	2019 Budget - revised			
44.	07/10/18	Steve Hart email to Melanie Montgomery			
45.	01/22/21	Transcript of 341 Meetings of Creditors Sea Girt, LLC			
46.	01/15/21	NRA Forward - Vendor Letter — NRA Dumps New York to Reincorporate in Texas			
47.	01/15/21	NRA Forward - Wayne LaPierre's Letter — NRA Dumps New York to Reincorporate in Texas			
48.	03/05/21	Transcript of 341 Meetings of Creditors Sea Girt, LLC	AMc EX 102		
49.	01/01/20	W. LaPierre Employment Agreement (Unexecuted)			
50.	03/02/21	Notice of March 14 Meeting			
51.	01/15/21	Notice to Board re Bankruptcy	AMc EX 107		
52.	04/28/20	Spray Employment Agreement			
53.	01/07/21	Board Meeting Frazer Notes	AMc EX 109		
54.	01/15/21	Email from Frazer - Announcement from WLP			
55.	02/08/21	Email from Frazer - Message from President Meadows			
56.	02/13/19	Calendar invite from Susan Dillon copying Frazer and Sarah Rogers			

57.	03/12/21	341 Meeting of Creditors of Sea Girt	AMc EX 131		
58.	09/08/18	NRA Audit Committee, September 8-9, 2018			
59.	06/26/19	Hearing Transcript (Virginia)			
60.	09/14/20	Judge Fish Order on Motion to Disqualify Brewer			
61.	06/22/20	Judge Toliver Order on Motion for Protective Order			
62.	04/25/19	LaPierre letter to NRA Board			
63.	04/22/19	LaPierre letter to Steve Hart			
64.	04/22/19	Hart email to NRA executives/board member			
65.	03/02/20	Article "The NRA Exodus: Who Left the Organization During a Year of Upheaval"			
66.	03/18/21	Notice of Second Amendment to NRA SOFA			
67.	07/30/18	Personal Statement of Sonya Rowling	AMc EX 147		
68.	01/15/21	Email from Duane Liptak to Frazer	AMc EX 148		
69.	08/09/18	Email from David Coy to Steve Hart, Charles Cotton	AMc EX 149		
70.	10/06/16	NRA 2017 Budget Planning by Ackerman	AMc EX 152		
71.	04/22/19	Winkler Letter to Spray re: Stanford Expenses			
72.	04/22/19	Winkler Letter to Schropp re: Expenses			

73.	03/07/19	Email from Montgomery to Spray RE Updated Billing Schedule			
74.	10/05/18	Winkler Letter to Spray RE Budget Adjustments			
75.	10/02/18	Winkler Letter to Powell RE AM budget			
76.	10/20/20	National Rifle Association's Motion to Transfer Cases for Coordinated or Consolidated Pre-Trial Proceedings (MDL)			
77.	01/18/21	Newsmax (Article & Video) - Charles Cotton to Newsmax TV: NRA Bigger, Better in Texas			
78.	10/01/19	AMc Original Answer, Counterclaim and Third-Party Complaint (N.D. Tex)	AMc EX 166		
79.	01/14/21	Payment Authorization from LaPierre for Brewer Firm Invoices	AMc EX 167		
80.	01/13/21	Kent Correll Invoice	AMc EX 168		
81.	04/29/19	Meeting Minutes of Audit Committee			
82.	12/14/18	Lockton Settlement Agreement			
83.	01/14/21	Brewer Invoice			
84.	01/15/21	NRA Forward - Press Release — NRA Dumps New York to Reincorporate in Texas			
85.	03/09/21	Article "NRA Board to Hold Emergency Hearing Amid Bankruptcy Turmoil"			
86.	05/06/19	Advocacy as Art- Lawyers Must Engage in...s and Crisis Management Texas Lawyer			
87.	03/16/21	Creditor Committee Response to Motions to Dismiss			

88.	04/12/19	Original Complaint in VA (First Lawsuit) - NRA Sues Ackerman and Mercury Group for Breach of Contract (Virginia Cause CL19001757)			
89.	05/03/20	Declaration of Wayne LaPierre			
90.	02/01/21	Judge Fish Order Staying Claims			
91.	10/02/19	Deposition of Arulanandam, Andrew (Virginia) (for reference)			
92.	11/03/20	Deposition of Boren, David Daniel Virginia) (for reference)			
93.	02/07/20	Deposition of Cotton, Charles (Virginia) (for reference)			
94.	03/27/21	Deposition of Cotton, Charles [Vol 1] (Bankruptcy) (for reference)			
95.	03/28/21	Deposition of Cotton, Charles [Vol 2] (Bankruptcy) (for reference)			
96.	02/12/20	Deposition of Erstling, Michael (NY AG) (for reference)			
97.	01/16/20	Deposition of Frazer, John (Virginia) (for reference)			
98.	03/15/21	Deposition of Frazer, John [Vol 1] (Bankruptcy) (for reference)			
99.	03/18/21	Deposition of Frazer, John [Vol 2] (Bankruptcy) (for reference)			
100.	01/10/20	Deposition of Hallow, Mildred (Virginia) (for reference)			
101.	02/04/20	Deposition of Hart, Steven (Virginia) (for reference)			
102.	03/18/21	Deposition of Journey, Phillip (Bankruptcy) (for reference)			
103.	09/24/19	Deposition of LaPierre, Wayne dated (Virginia) (for reference)			

104.	06/17/20	Deposition of LaPierre, Wayne (NY AG) (for reference)			
105.	03/22/21	Deposition of LaPierre, Wayne [Vol 1] (Bankruptcy) (for reference)			
106.	03/23/21	Deposition of LaPierre, Wayne [Vol 2] (Bankruptcy) (for reference)			
107.	03/24/21	Deposition of Makris, Anthony (Bankruptcy) (for reference)			
108.	01/29/20	Deposition of Meadows, Carolyn (Virginia) (for reference)			
109.	12/18/19	Deposition of Oliver North (Virginia/Texas) (for reference)			
110.	03/19/21	Deposition of Phillips, Wilson (Bankruptcy) (for reference)			
111.	03/19/21	Deposition of Rowling, Sonya (Bankruptcy) (for reference)			
112.	10/03/19	Deposition of Spray, Craig (Virginia) (for reference)			
113.	06/12/20	Deposition of Spray, Craig (NY AG) (for reference)			
114.	03/24/21	Deposition of Spray, Craig (Bankruptcy) (for reference)			
115.	03/25/21	Deposition of Stanford, Gayle (Bankruptcy) (for reference)			
116.	01/30/20	Deposition of Supernaugh, Lisa (Virginia) (for reference)			
117.	03/06/20	Deposition of Supernaugh, Lisa (NY AG) (for reference)			
118.		(intentionally omitted)			
119.	03/26/21	Deposition of Winkler, William [Corporate Representative] (Bankruptcy) (for reference)			

120.	03/26/21	Deposition of Winkler, William (Bankruptcy) (for reference)			
121.	02/04/21	Order Denying Transfer (MDL)			
122.	02/22/21	Sea Girt January MOR			
123.	02/22/21	NRA January MOR			
124.	03/22/21	Sea Girt February MOR			
125.	03/22/21	NRA February MOR			
126.	12/31/19	Aronson Audit Report			
127.	01/29/21	Brewer Retention Application [Dkt. No. 84]			
128.	06/12/19	Sullivan Letter to John Frazer RE Lt. Col. Oliver North			
129.	05/15/18	Contract Employment Agreement North and Ackerman McQueen			
130.	07/10/18	Hart E-mail to Montgomery			
131.	09/08/18	NRA Report of Audit Committee Arlington			
132.	09/15/18	Makris E-mail to Hart			
133.	09/26/18	Hart E-mail to Makris			
134.	10/11/18	Hart E-mail to Makris Summary of Summit			
135.	10/24/18	Hart E-mail to Makris			

136.	04/30/17	Service Agreement (unsigned)			
137.	03/30/17	Hart E-mail to Winkler			
138.	12/21/18	December letter from Sarah Rogers			
139.	01/04/19	J. Madrid Letter to Hart			
140.	01/10/19	S. Ryan Letter to Hart			
141.	01/17/19	E-mail chain, Hart, Frazer, and Ryan			
142.	02/07/19	Makris E-mail to Hart			
143.	02/22/19	Hart's list of concerns for Audit Committee			
144.	02/22/19	Hart E-mail to Makris			
145.	03/12/19	Hart E-mail to Makris, forwarding Frazer e-mail			
146.	03/15/19	Hart E-mail to Makris			
147.	04/12/19	Original Complaint (VA 1757)			
148.	04/14/19	Hart E-mail to Makris			
149.	04/22/19	Hart E-mail to board members			
150.	04/22/19	Hart E-mail to Makris, S. LaPierre			
151.	04/26/19	Fischer E-mail to Hallow, Contact from B. Woodruff			

152.	05/13/20	NRA Corporate Structure			
153.		Summary of NRA's Schedule F			
154.	04/22/19	Winkler letter to Wayne LaPierre RE Clothing purchases			
155.	04/22/19	Winkler letter to Wayne LaPierre RE Documentation of Exenses			
156.	08/20/19	NRA Responses to Ackerman First ROGGS (Virginia)			
157.	04/07/19	Email to Spray RE Brewer Payments Update			
158.	03/11/19	Brewer Payments spreadsheet			
159.	06/00/19	Brewer Payments spreadsheet			
160.	05/30/19	Email from Boren to Lance			
161.	04/25/19	Email from Boren to Governor Anoatubby			
162.	04/24/19	Text Message from Boren to Millie Hallow			
163.	04/29/19	Millie Hallow typed notes			
164.	11/01/19	Boren resignation letter			
165.	04/02/21	State of Texas Amicus Brief			
166.	06/07/99	Article: Gun Industry Seeks to Shut a Trade Group			
167.	03/15/94	Article: NRA Withdraws as Governing Body of US Shooting Team			

168.	04/01/97	Article: The Future for NRA			
169.	08/14/19	Article: Wayne LaPierre Promised Job Security			
170.	04/20/97	Article: Williams Elected to NRA Board			
171.	01/18/21	Former Georgia Congressman Bob Barr on Newsmax // January 18, 2021			
172.	03/21/19	Morgan Stanley Memorandum			
173.	07/15/20	Brewer Presentation (https://www.documentcloud.org/documents/20523018-nra-domicile-slides-002)			
174.	06/12/20	Original Complaint (NRA v. North)			
175.	07/22/20	LtCol Oliver North Answer (NRA v. North)			
176.	04/24/19	Email from Millie Hallow to Oliver North			
177.	04/23/18	Fax from Noram Partners to Millie Hallow			
178.	03/12/21	NRA Second Amended Complaint (NDTX)			
179.	03/02/21	Notice of Deposition of NRA Corporate Representative			

AMc also reserves the right to rely upon and use as evidence: (i) exhibits included on the exhibit list of any other parties in interest, and (ii) any pleading, hearing transcript, or other document filed with the Court in the above-captioned cases.

Date: April 6, 2021

Respectfully submitted,

DORSEY & WHITNEY LLP

/s/ G. Michael Gruber

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**ATTORNEYS FOR ACKERMAN McQUEEN,
INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on all parties receiving notice by and through the Court's CM/ECF system on April 6, 2021.

/s/ G. Michael Gruber

G. MICHAEL GRUBER